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11 **UNITED STATES DISTRICT COURT**
12 **EASTERN DISTRICT OF CALIFORNIA**

13 JOSE JUAN RIVERA ALATORRE,) Case No.: 1:23-cv-01686-SKO
14 Plaintiff,) STIPULATION AND UNOPPOSED
vs.) MOTION FOR AN EXTENSION OF TIME;
15) ORDER
16 MARTIN O'MALLEY,)
Commissioner of Social Security,)
17)
Defendant.)

18
19 Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the
20 parties, through their respective counsel of record, that the time for Defendant to respond to
21 Plaintiff's Motion for Summary Judgment be extended fourteen (14) days from July 3, 2024, up
22 to and including July 17, 2024. This is the Defendant's second request for an extension.

23 The undersigned counsel for Defendant ("Counsel") makes this request in good faith and
24 for good cause. Upon review of the record and Opening Brief, Counsel prepared a memorandum
25 to the client exploring settlement options in this matter. To allow time for the client to respond to
26 the memorandum and negotiate a possible settlement with Plaintiff, or draft a responsive brief, if
27 necessary, I am requesting a 14-day extension, until July 17, 2024, to file Defendant's brief.
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1 Although Counsel has worked diligently on this matter and other assigned cases, this extension is
2 necessary.

3 The parties further stipulate that the Court's Scheduling Order shall be modified
4 accordingly.

5
6 Respectfully submitted,

7 Dated: July 2, 2024

/s/ *Dolly M. Trompeter**
DOLLY M. TROMPETER
Attorney for Plaintiff
(*signature authorized via e-mail July 2, 2024)

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9 Dated: July 2, 2024

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11 PHILLIP A. TALBERT
United States Attorney
12 MATHEW W. PILE
Associate General Counsel
13 Office of Program Litigation, Office 7

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15 By: /s/ *Michael J. Mullen*
MICHAEL J. MULLEN
16 Special Assistant U.S. Attorney
17 Attorneys for Defendant

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19 **ORDER**

20 Pursuant to the parties' Stipulation (Doc. 19), and for good cause shown,

21 IT IS HEREBY ORDERED that Defendant shall have an extension of 14 days, to July 17,
22 2024, to file the Commissioner's responsive brief. Plaintiff shall have up to and including July 31,
23 2024, to file an optional reply.

24
25 IT IS SO ORDERED.

26 Dated: July 3, 2024

/s/ *Sheila K. Oberto*
UNITED STATES MAGISTRATE JUDGE